

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

MOHAREB A. HAMDAN and
ADAIL M. HAMDAN,

Defendants.

Case No. **19-CR-187**
[18 U.S.C. § 1001]

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

1. On or about May 6, 2019, in the State and Eastern District of Wisconsin,

**MOHAREB A. HAMDAN and
ADAIL M. HAMDAN,**

in a matter within the jurisdiction of the executive branch of the Government of the United States, did knowingly and willfully make materially false and fraudulent statements and representations, by making the following statements to representatives of the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"), an agency within the U.S. Department of Justice, while being jointly interviewed by representatives of the ATF concerning their purchase of tobacco products and the payment of excise taxes on such products: Mohareb Hamdan and Adail Hamdan stated that they had never heard of Sharif Enterprise, Shenango Distributors or AR Distributors and, as far as they could remember, had never purchased tobacco products from these businesses.

2. The defendants' statements and representations were false and fraudulent because, as the defendants each then and there knew, during the period from January 2015 through February

2018, the defendants made more than 90 purchases of tobacco products from Sharif Enterprise, Shenango Distributors and AR Distributors and paid more than \$70,000 for these products.

All in violation of Title 18, United States Code, Section 1001(a)(2).

11/5/19
Date

Kelly D. Krueger
for MATTHEW D. KRUEGER
United States Attorney